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October 20, 2013

VIA ECF

Honorable Pamela K. Chen
District Court Judge
United States District Court, E.D.N.Y.
225 Cadman Plaza East
Brooklyn, New York 11201

Re: GORBOVITSKY v. VAYNTRUB et al.
Case No.: 13-CV-03093 (PKC) (AKT)
Our File No.: 7375-G

Your Honor:

We represent the Defendants INVAR CONSULTING LTD., GENOMETRICA LTD. and GENOMETRICA RESEARCH, INC. (hereinafter "Defendants.") in the matter referenced herein above. For the emergency reasons set forth below, we are writing to respectfully request that the Court extend Defendants' deadlines in the matter referenced herein above.

It is with great regret and sadness that I inform the Court that my father Christos Angelis, passed away yesterday, October 19, 2013. My father was residing in Amarynthos, Euboia, Greece, As a result, I need to travel overseas to be there for his funeral and my mother. My itinerary is annexed hereto for the Court's reference. I am leaving today, October 20, 2013.

Accordingly, it is necessary that I briefly suspend my professional duties. As the Court can see from the itinerary, my hope is to return to the United States on October 29, 2013, but depending on the situation that I will have to contend with and the developments that might occur once I arrive in Greece, my itinerary may just have to change. My parents have been living in Greece since 1985 and there may be legal issues that need my attention before I get back necessitating my stay in Greece past October 29, 2013. For these reasons, I am left with no other choice but to request a continuation of the deadlines in this matter by at least two weeks.

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Hon. A. Kathleen Tomlinson
U.S.M.J. - E.D.N.Y.
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While the Defendants are currently also represented by both Hoffheimer, Guttler and Gross, and Blank Rome, Intellectulaw's presence is critical in the matter since Defendants' litigation involves the participation of all three counsel as opposed to one, to the exclusion of the others.

We truly regret that it has become necessary to invoke the Court's intervention in this matter. Nonetheless, we respectfully request for the Court's indulgence and Order adjourning the parties' deadlines as follows:

1. Defendants reply in further support of the motion on or about November 13, 2013;
2. Status Conference on or about November 20, 2013.

Your Honor's patience and understanding are greatly appreciated.

Respectfully submitted,


Panagiota Betty Tufariello

PBT:ao

cc Robert Kenney, Esq.
Nicholas Malito, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **October 20, 2013 LETTER TO HON. CHEN** has been filed via ECF, a notice of which will be sent by operation of the Court's electronic filing system to all parties, and has also been served to counsel for Plaintiff via Electronic Mail, addressed to:

Arthur Morrison, Esq.
11 Skyline Drive
Hawthorne, NY 10532
E-mail: akatz@xand.com

William V. Rapp, Esq.
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New York, NY 10038
E-mail: gkoerner@koerner-associates.com

on October 20, 2013



Panagiota Betty Tufariello, Esq.

Alina Orban

Subject: FW: PANAGIOTA B NYC-KENNEDY 20OCT13

From: Delta Air Lines [<mailto:DeltaAirLines@e.delta.com>]

Sent: Saturday, October 19, 2013 2:07 PM

To: Betty Tufariello

Subject: PANAGIOTA B NYC-KENNEDY 20OCT13

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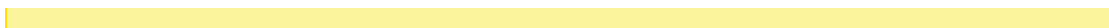
Flight Confirmation #: **HYPVI5** | Ticket #: **00621755495270**


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Your Flight Information

Sun 20OCT				
LV 6:10pm	NYC-KENNEDY	AR 7:45am **Mon 21OCT	PARIS-DEGAULLE	DELTA 184 ECONOMY (V) Dinner
Mon 21OCT				
LV 9:50am	PARIS-DEGAULLE	AR 2:05pm	ATHENS	DELTA 8683* ECONOMY (V) Breakfast
Tue 29OCT				
LV 8:10am	ATHENS	AR 9:15am	ROME-FIUMICINO	DELTA 6676* ECONOMY (K)

LV 2:45pm	ROME-FIUMICINO	AR 7:35pm	NYC-KENNEDY	DELTA 6588* ECONOMY (K) Lunch
**Arrival date is different than departure date. *Flight 8683 Operated by AIR FRANCE As AF Flt 1532 *Flight 6676 Operated by NEW ALITALIA As AZ Flt 717 *Flight 6588 Operated by NEW ALITALIA As AZ Flt 610				



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Passenger Details	Flights	Seats
PANAGIOTA BETTY TUFARIELLO >Add SkyMiles # >Join SkyMiles	DELTA 184 DELTA 8683 DELTA 6676 DELTA 6588	21F See delta.com See delta.com See delta.com

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Receipt Information

Billing Details		
Passenger: PANAGIOTA BETTY TUFARIELLO	Payment Method: AX*****3008	Ticket Number: 00621755495270
FARE:	786.00 USD	
Taxes/Carrier-imposed Fees:	617.30	

Ticket Amount: 1403.30 USD

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Total: 617.30

Itemized: 2.50 AY 5.00 XA 7.00 XY 5.50 YC 16.90 FR 9.30 QX 29.80 GR 20.50
WP 6.80 WQ 10.20 HB 25.70 IT 1.20 MJ 438.00 YR 4.50 XF 34.40
US

Fare Details

**NYC DL X/ PAR DL ATH M229.50VKPR5US DL X/ROM DL NYC M556.50KKXB6OUS
NUC786.00END ROE1.00 XF JFK4.5**

Service Charges/Fees

Service Charges/Fee# 00607675452775

Fees: 25.00 USD

Total: 25.00 USD

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Ticketing Details

Passenger:	Ticket #:	Place of Issue:	Issue Date:	Expiration Date:
PANAGIOTA BETTY TUFARIELLO	00621755495270	ATLRES	19OCT13	19OCT14

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Airline Rule Applied	Origin	Destination	Baggage			Tax	Total
Sun 20 Oct 2013							
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DELTA	CDG	ATH	FREE ¹ CARRY ON	FREE	FREE	\$0.00	\$0.00
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Tue 29 Oct 2013							
DELTA	ATH	FCO	FREE ¹ CARRY ON	FREE	<div><div></div><div>U S D</div></div> <div>\$100</div>	\$0.00	\$100.00

				FIRST		
					SECOND	
DELTA	FCO	JFK	FREE ¹ CARRY ON	FREE	FREE	\$0.00
				FIRST	SECOND	
						\$100.00

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